

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE RECONNAISSANCE ENERGY
AFRICA LTD. SECURITIES
LITIGATION

Case No. 1:21-cv-06176-NRM-RML

Honorable Nina R. Morrison

**LEAD PLAINTIFF'S NOTICE OF UNOPPOSED MOTION FOR
(I) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;
(II) CERTIFICATION OF THE U.S. SETTLEMENT CLASS; AND
(III) APPROVAL OF NOTICE TO THE U.S. SETTLEMENT CLASS**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD HEREIN:

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff Robert Partovy (“U.S. Lead Plaintiff”), hereby moves this Court on a date and at such time as may be designated by the Honorable Nina R. Morrison, Courtroom 6E North, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, for an order: (i) granting preliminary approval of the proposed U.S. Settlement; (ii) certifying the U.S. Settlement Class for purposes of settlement only; (iii) granting approval of the form and manner of giving notice of the proposed U.S. Settlement to U.S. Settlement Class Members; and (iv) setting a date for a final U.S. Settlement Hearing and deadlines for providing notice of the U.S. Settlement, the filing of U.S. Settlement Class Member objections, the submission of requests for exclusion by U.S. Settlement Class Members, the filing of U.S. Lead Plaintiff’s motion for final approval of the U.S. Settlement, and the filing of U.S. Lead Counsel’s application for attorneys’ fees and expenses.¹

This motion is based upon the concurrently filed Memorandum of Law, the Spencer Declaration, and other such matters and argument as the Court may consider at the hearing on this motion. Defendants, as defined in the Stipulation, do not oppose this motion.

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Global Stipulation and Agreement of Settlement dated February 27, 2024 (the “Stipulation”), which is attached as Exhibit 1 to the Declaration of Garth Spencer in Support of Lead Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement (“Spencer Declaration”).

Dated: February 27, 2024

GLANCY PRONGAY & MURRAY LLP

By: /s/ Garth A. Spencer
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*Counsel for U.S. Lead Plaintiff Robert Partovy and
the Proposed U.S. Settlement Class*

PROOF OF SERVICE

I hereby certify that on this 27th day of February 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/ Garth Spencer _____

Garth Spencer